



February 23, 2010  
*Via ECFS Transmission*

Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36**  
**2009 CPNI Certification for Tim Ron Enterprises, LLC**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2010-01, DA 10-91, EB Docket No. 06-36, released January 15, 2010 and pursuant to 47 C.F.R. § 64.2009(e), Tim Ron Enterprises, LLC hereby files its Certification of Customer Proprietary Network information (CPNI) and its supporting Statement for the year 2009. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3006 or [croesel@tminc.com](mailto:croesel@tminc.com) if you have any questions about this filing.

Sincerely,

Carey Roesel  
Consultant to Tim Ron Enterprises, LLC

CR/gs  
*Enclosure*

cc: Best Copy and Printing ([FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
Ronnie Martin – Tim Ron  
file: Tim Ron – FCC CPNI  
tms: FCCx1001

## EB Docket 06-36

**Attachments:** Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## Statement of CPNI Procedures and Compliance

### **USE OF CPNI**

Tim Ron Enterprises, LLC ("Tim Ron") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Tim Ron has trained its personnel not to use CPNI for marketing purposes. Should Tim Ron elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

### **PROTECTION OF CPNI**

Tim Ron has put into place processes to safeguard its customers' CPNI/call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

Although it has never occurred, Tim Ron will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. The company may also call the telephone number of record for that account and disclose call detail information. If it elects to disclose CPNI over the phone under any other circumstances in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

Company has put into place procedures to notify customers whenever an address of record is created or changed without revealing the changed information or sending the notification to the new account information.

### **DISCLOSURE OF CPNI ONLINE**

Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information.

### **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

Tim Ron may disclose CPNI in-store only if the customer presents a valid photo ID matching the account information.

**NOTIFICATION TO LAW ENFORCEMENT**

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Although it has never occurred, Tim Ron will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

**ACTIONS AGAINST DATA BROKERS**

Company has not taken any actions against data brokers in the last year.

**CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2009.

**INFORMATION ABOUT PRETEXTERS**

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI.